

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

QUANTUM TECHNOLOGY INNOVATIONS,
LLC

Plaintiff,

v.

VALVE CORPORATION,
GEARBOX SOFTWARE, LLC
Defendants

Civil Action No. 2:23-cv-425-JRG-RSP

**DECLARATION OF CHRISTOPHER SCHENCK IN SUPPORT
OF VALVE CORPORATION'S MOTION TO DISMISS UNDER
FEDERAL RULE OF CIVIL PROCEDURE 12(b)(3) FOR IMPROPER VENUE**

1. My name is Christopher Schenck. I am over the age of twenty-one years, of sound mind, and competent in all respects to make this declaration.

2. I make this declaration based on my own knowledge and investigation within Valve Corporation ("Valve") as to the matters reflected within this declaration. I could and would competently testify to the accuracy of this declaration if called upon to testify regarding its contents.

3. I am in-house counsel at Valve. I have been employed by the company since 2018.

4. Valve is incorporated in the state of Washington and has its headquarters at 10400 Northeast Fourth St. Fl. 14, Bellevue, WA 98004.

5. Valve does not have a physical presence in the Eastern District of Texas.

6. Valve does not own any real property, rent any office space, or possess or control any “shelf space” (i.e., it does not rent out a table in a retail store to sell its products) in the Eastern District of Texas.

7. Valve has no record of an employee named Helen Pope ever working for Valve.

8. Valve has no record of an employee named Mitchell Ludolf ever working for Valve.

9. Brandon Reinhart is a former Valve employee and independent contractor for Valve, his contract with Valve has ended.

10. Jenni Jacobi is a current independent contractor Valve hired through a third-party. She focuses on video and event production work, such as contract management and project coordination.

11. Helen Pope, Mitchell Ludolf, Brandon Reinhart, and Jenni Jacobi are not current employees of Valve.

12. Valve has not focused on the development of augmented reality since 2013.

13. Although Valve uses third-party companies to provide customer support, none of the facilities that Valve uses for customer support are located in Texas.

14. Valve is not related to Gearbox Software LLC (“Gearbox”). Valve does not have any control or authority over Gearbox.

15. Gearbox developed an expansion of Valve’s game Half-Life entitled Half-Life: Opposing Force, which released in November 1999.

16. Gearbox developed another expansion of Valve’s game Half-Life entitled Half-Life: Blue Shift, which released in June 2001.

17. Later in 2001, Valve entered into a contractual agreement with Gearbox to do additional video game development work and create video game content.

18. In 2002, Valve terminated its contract with Gearbox.

19. Since 2002, Valve has not collaborated with Gearbox to develop any products.

20. Valve and Gearbox did not work together to develop the Steam gaming platform.

21. Valve and Gearbox are separate entities that do not share any common ownership, employees, or office space.

22. Gearbox is one of thousands of game developers that sell their products on Valve's Steam platform.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 13, 2023



Christopher Schenck